

PERMITTEES COMMENT

CLASS 2 PERMIT MODIFICATION REQUEST

MONITOR FOR HYDROGEN AND METHANE UNTIL FINAL PANEL CLOSURE

SUBMITTED JANUARY 17, 2008

During the December 14, 2007, public information meeting in Santa Fe, it was suggested that a condition which indicates that the Permittees will notify the New Mexico Environment Department of the results of the hydrogen and methane monitoring program on a semi-annual basis be added to the previously submitted revised Permit language.

The Permittees concur with this request and suggest the following changes:

Revise the proposed Table of Contents to;

IV.F.5 Hydrogen and Methane Monitoring

IV.F.5.a Implementation of Hydrogen and Methane Monitoring

IV.F.5.b Reporting Requirements

IV.F.5.c Notification Requirements

IV.F.5.d Remedial Action

IV.F.5.e Sampling Line Loss

Revise the proposed text in Module IV.F.5.b-e:

IV.F.5 Hydrogen and Methane Monitoring Program

IV.F.5.a Implementation of the Hydrogen and Methane Monitoring - the Permittees shall implement the Hydrogen and Methane Monitoring Program specified in Permit Attachment N1.

IV.F.5.b Reporting Requirements - The Permittees shall report to the Secretary semi-annually, beginning six (6) months after issuance of this Permit, validated data from the Hydrogen and Methane Monitoring Plan.

IV.F.5.c. Notification Requirements - The Permittees shall notify the Secretary in writing, within seven (7) calendar days of obtaining validated analytical results, whenever the concentration of hydrogen or methane in a filled panel exceeds the Action Levels specified in Table IV.F.5.a below.

The Permittees will also notify the e-mail notification list within seven (7) calendar days of obtaining validated analytical results if the Action Levels are exceeded.

Table IV.F.5.a.

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| <u>IV.F.5.d</u> | <u>Remedial Action - upon receiving validated analytical results that indicate that Action Level 1 has been reached or exceeded sampling will be increased to weekly. Upon receiving validated analytical results that indicate that Action Level 2 has been reached or exceeded in two consecutive weekly samples the explosion isolation wall will be installed.</u> |
| <u>IV.F.5.e</u> | <u>Sampling Line Loss - Any loss of sampling lines will be evaluated as described in Section N1-5b, and notifications submitted to the Secretary and to the e-mail notification list within seven (7) calendar days of the discovery of loss of sampling line(s).</u> |